

Collier Shannon Scott

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June 20, 2000

Jere W. Glover, Esq.
Chief Counsel for Advocacy
U.S. Small Business Administration
409 Third Street, S.W.
Washington, D.C. 20416

Dear Jere:

Our firm represents approximately 60 trade associations, covering a wide array of industries that constitute a significant percentage of our domestic economy. For many of these trade associations, we serve as legislative and regulatory counsel. We have been privileged to "provide the hall" for the Office of Advocacy's monthly Environmental Roundtable meetings.

Our trade association clients have enjoyed an excellent working relationship with Office of Advocacy for nearly 20 years, beginning with the Environmental Protection Agency's ("EPA") gasoline lead phasedown rulemaking. Led largely throughout this nearly two decades by Kevin Bromberg, the Office of Advocacy has been able to assemble and submit small business data to EPA, comment forcefully and effectively through interagency channels with EPA, and affect the outcomes of many EPA rules. In many respects, the enactment of the Small Business Regulatory Enforcement and Fairness Act ("SBREFA") codified what Kevin and others in your office largely had been doing with EPA and other agencies on a working relationship basis.

Some examples of the Office of Advocacy's effectiveness with EPA that readily come to mind include: the 10-year phase-in under the underground storage tank program; alternative format reporting under the Toxics Release Inventory; group stormwater permitting; reworking the metal parts and machinery effluent limitations guideline rulemaking; and, paperwork reduction efforts, such as eliminating Tier I or II reporting for retail gasoline outlets. Your office certainly has had many more notable accomplishments in representing small business interests before EPA.

The Office of Advocacy increasingly is playing a more effective role with the Occupational Safety and Health Administration ("OSHA"). Anita Drummond successfully organized small business users of metal removal fluids, who were strong advocates on an OSHA Standards Advisory Committee. The Office of Advocacy also has been a tremendous assistance to small business by helping to guide our trade association clients through the very complex, pending OSHA ergonomics rulemaking.

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The best feature of the Office of Advocacy has been that you and your staff are always accessible to our small business clients and that you and your staff have advocated for small business with tremendous zeal. Many of our small business trade associations have limited budgets, so they have particularly appreciated your office's ability to collect and analyze technical data that make a difference in agency proceedings. Further, while the evolving SBREFA process has not been perfect, the Office of Advocacy has made a difference on the review panels.

Our small business trade association clients appreciate this opportunity to share their views on the Office of Advocacy.

Sincerely,



JEFFREY L. LEITER